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*Attorneys for Defendant  
Convergent Outsourcing, Inc.*

**UNITED STATES DISTRICT COURT**

## **DISTRICT OF NEVADA**

VICKI WILL, individually and on behalf of all others similarly situated,

**Plaintiff:**

V.

## CONVERGENT OUTSOURCING, INC.,

Defendant.

Case No.: 2:22-cv-02081-MMD-EJY

**STIPULATION AND ORDER  
EXTENDING TIME FOR DEFENDANT  
TO RESPOND TO PLAINTIFF'S  
COMPLAINT**

(FIRST REQUEST)

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiff Vicki Will (“Plaintiff”) and Defendant Convergent Outsourcing, Inc. (“Defendant”) (collectively, the “Parties”), hereby stipulate, agree, and respectfully request that the Court extend the deadline for Defendant to answer or otherwise respond to Plaintiff’s Complaint until the later of either February 8, 2023, or thirty (30) days after the filing of a Consolidated Amended Complaint in the Western District of Washington. Alternatively, in the event that the currently pending Joint Motion to Transfer Venue (the “Joint Motion to Transfer”) is not granted, the Parties request that the deadline for Defendant to answer or otherwise respond to Plaintiff’s Complaint be extended until thirty (30) days after denial of that Joint Motion to Transfer. In support of this Stipulation, the Parties jointly state as follows:

1. On November 15, 2022, Plaintiff filed this action in the Eighth Judicial District Court of Clark County, Nevada, Case No. A-22-861272-C, asserting claims related to Defendant's alleged failure to secure Plaintiff's and putative class members' personally identifiable information, resulting in a data security incident.

1           2. On December 16, 2022, Defendant removed this action to this Court. (ECF No. 1).  
2           3. Defendant's response to the Complaint is due on December 23, 2022.  
3           4. Together, Defendant and Plaintiff moved on December 16, 2022 to transfer this  
4 action to the United States District Court for the Western District of Washington, where multiple  
5 class actions arising from the same alleged incident were recently consolidated under the caption  
6 *Guy v. Convergent Outsourcing, Inc.*, No. C22-1558 MJP (W.D. Wash.), and where a Consolidated  
7 Amended Complaint will soon be filed.

8           5. An extension of Defendant's deadline to respond to the Complaint until the later of  
9 either February 8, 2023, or thirty (30) days after the filing of a Consolidated Amended Complaint  
10 in the Western District of Washington will permit sufficient time to work through various transfer  
11 and consolidation issues related to the pending actions. Also, in the event the Joint Motion to  
12 Transfer is denied, an extension of thirty (30) days after such denial will allow the Parties time to  
13 address issues related to the unconsolidated actions prior to Defendant responding to the Complaint.

14           6. This is Defendant's first request for an extension of time to respond to the  
15 Complaint, the request is not for the purposes of delay, and the requested extension will not  
16 prejudice any party.

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1           7. WHEREFORE, the Parties hereby stipulate, agree, and respectfully request that the  
2 Court extend the deadline for Defendant to answer or otherwise respond to Plaintiff's Complaint  
3 until the later of either February 8, 2023, or thirty (30) days after the filing of a Consolidated  
4 Amended Complaint if the Joint Motion to Transfer is granted. Alternatively, in the event that the  
5 currently pending Joint Motion to Transfer is not granted, the Parties request that the deadline for  
6 Defendant to answer or otherwise respond to Plaintiff's Complaint be extended until thirty (30)  
7 days after denial of that Joint Motion to Transfer.

8 DATED this 19th day of December, 2022.

9           KIND LAW

10 By: /s/ Michael Kind

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14 Attorney for Plaintiff Vicki Will

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15 Attorneys for Defendant  
16 Convergent Outsourcing, Inc.

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18 IT IS SO ORDERED:

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21 UNITED STATES MAGISTRATE JUDGE

22 DATED: December 19, 2022